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**Attorneys for Plaintiff**

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

K.A.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;  
MG FREESITES, LTD., a foreign  
entity; MINDGEEK USA  
INCORPORATED, a Delaware  
corporation; MG PREMIUM LTD, a  
foreign entity; MG GLOBAL  
ENTERTAINMENT INC., a Delaware  
corporation; 9219-1568 QUEBEC,  
INC., a foreign entity; BERND  
BERGMAIR, a foreign individual;  
FERAS ANTOON, a foreign  
individual; DAVID TASSILLO, a  
foreign individual; VISA INC., a  
Delaware corporation; REDWOOD  
CAPITAL MANAGEMENT, LLC, a  
Delaware limited liability company;  
REDWOOD DOE FUNDS 1-7;  
COLBECK CAPITAL  
MANAGEMENT, LLC, a Delaware  
limited liability company; COLBECK  
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04786-WLH-ADS

**JOINT STIPULATION TO  
REQUEST SUBSTITUTION OF  
REDWOOD AND COLBECK  
DOE FUND DEFENDANTS IN  
PLAINTIFF'S COMPLAINT**

Judge: Hon. Wesley L. Hsu

Complaint filed: June 7, 2024

Trial Date: None Set

1 Plaintiff K.A. (“Plaintiff”) and Defendants MindGeek S.à r.l, MG Freesites Ltd,  
2 MindGeek USA Incorporated, MG Premium Ltd, MG Global Entertainment Inc.,  
3 9219-1568 Quebec Inc., Visa Inc., Redwood Capital Management, LLC, Colbeck  
4 Capital Management, LLC, Bernd Bergmair, Feras Antoon, and David Tassillo  
5 (collectively, “Defendants”) (collectively with Plaintiff, the “Parties”), by and through  
6 their counsel, hereby stipulate as follows:

7 WHEREAS, on May 23, 2024, in a related case—*Fleites v. MindGeek S.a.r.l.*  
8 *et al.*, Case No. 21-cv-04920-WLH-ADS) (“*Fleites* Action”) —Plaintiff Serena Fleites  
9 filed both a Motion to Amend the Caption and a Second Amended Complaint, which  
10 identifies Colbeck and Redwood as new defendants (ECF Nos. 384, 385);

11 WHEREAS, after filing the Second Amended Complaint in the *Fleites* Action,  
12 between June 7, 2024 and August 20, 2024, Plaintiff’s counsel Brown Rudnick LLP  
13 also filed fourteen (14) additional actions against the same Defendants in the United  
14 States District Court for the Central District of California, each of which has been  
15 designated as “related” and assigned to the Honorable Wesley L. Hsu (the “Related  
16 Actions”);

- 17 • *K.A. v. MindGeek S.A.R.L. et al.*, 24-cv-04786;
- 18 • *N.L. v. MindGeek S.A.R.L. et al.*, 24-cv-04788;
- 19 • *T.C. v. MindGeek S.A.R.L. et al.*, 24-cv-04795;
- 20 • *X.N. v. MindGeek S.A.R.L. et al.*, 24-cv-04800;
- 21 • *N.Y. v. MindGeek S.A.R.L. et al.*, 24-cv-04801;
- 22 • *L.T. v. MindGeek S.A.R.L. et al.*, 24-cv-04791;
- 23 • *J.C. v. MindGeek S.A.R.L. et al.*, 24-cv-04971;
- 24 • *W.L. v. MindGeek S.A.R.L. et al.*, 24-cv-04977;
- 25 • *C.S. v. MindGeek S.A.R.L. et al.*, 24-cv-04992;
- 26 • *S.O. v. MindGeek S.A.R.L. et al.*, 24-cv-04998;
- 27 • *L.S. v. MindGeek S.A.R.L. et al.*, 24-cv-05026;

- 1 • *W.P. v. MindGeek S.A.R.L. et al.*, 24-cv-05185;
- 2 • *A.K. v. MindGeek S.A.R.L. et al.*, 24-cv-05190; and
- 3 • *J.L. v. MindGeek S.A.R.L., et al.*, 24-cv-07046.

4 WHEREAS, Plaintiff in the *Fleites* Action filed the names of the Redwood Doe  
5 Funds and Colbeck Doe Funds under seal at the time she filed her Second Amended  
6 Complaint and Motion to Amend the Caption;

7 WHEREAS, the same Redwood Doe Funds and Colbeck Doe Funds are named  
8 as defendants in the Related Actions;

9 WHEREAS, on June 18, 2024, Plaintiff in the *Fleites* Action filed a Motion to  
10 Unseal the Names of the Redwood and Colbeck Fund Defendants in the Second  
11 Amended Complaint (ECF No. 400, *Fleites v. MindGeek S.a.r.l. et al.*, Case No. 21-  
12 cv-04920-WLH-ADS, “Motion to Unseal”);

13 WHEREAS, on July 5, 2024, the MindGeek Defendants filed a notice of non-  
14 opposition to Plaintiff’s Motion to Unseal in the *Fleites* Action (ECF No. 403, *Fleites*  
15 *v. MindGeek S.a.r.l. et al.*, Case No. 21-cv-04920-WLH-ADS);

16 WHEREAS, on July 9, 2024, the Court in the *Fleites* Action granted Plaintiff’s  
17 Motion to Unseal (ECF No. 407, *Fleites v. MindGeek S.a.r.l. et al.*, Case No. 21-cv-  
18 04920-WLH-ADS);

19 WHEREAS, *J.L. v. MindGeek S.A.R.L., et al.*, 24-cv-0704 was filed after the  
20 names of the Redwood and Colbeck Fund Defendants were unsealed.

21 WHEREAS, Plaintiff seeks the following relief:

22 (1) Substitution of Defendants Redwood Doe Funds 1-7 in the caption and  
23 Plaintiff’s complaint with Redwood Master Fund, Ltd; Redwood Opportunity Master  
24 Fund, Ltd; Manuel 2018, LLC; Ginogerum, LLC; and White-Hathaway Opportunity  
25 Fund, LLC; and

26 (2) Substitution of Defendants Colbeck Doe Funds 1-3 in the caption and  
27 Plaintiff’s complaint with CB Media Ventures DD, LLC; CB Agency Services, LLC;  
28

1 and CB Participations SPV, LLC;

2 WHEREAS, Defendants do not oppose Plaintiff's request, but the Parties agree  
3 that this stipulation is without prejudice to Defendants' objections and defenses,  
4 including any objection or defense based on statutes of limitations;

5 Accordingly, the Parties respectfully request that this Court enter the [Proposed]  
6 Order concurrently filed with this Joint Stipulation.

7 IT IS SO STIPULATED.

8  
9 DATED: December 20, 2024

**BROWN RUDNICK LLP**

10  
11 By: /s/ Lauren Tabaksblat

12 Michael J. Bowe  
13 Lauren Tabaksblat

14 **OLSON STEIN LLP**

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16 By: /s/ David M. Stein

17 David M. Stein

18 *Attorneys for Plaintiff*  
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27  
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1 DATED: December 20, 2024

**MINTZ LEVIN COHN FERRIS GLOVSKY  
AND POPEO P.C.**

2  
3 By: /s/ Esteban Morales Fabila

4 Esteban Morales Fabila

5 Peter A. Biagetti

6 *Attorneys for Defendants MindGeek S.à r.l.,*  
7 *MG Freesites Ltd, MindGeek USA*  
8 *Incorporated, MG Premium Ltd, MG*  
9 *Global Entertainment Inc., and 9219-1568*  
*Quebec Inc.*

10  
11 DATED: December 20, 2024

**WEIL, GOTSHAL & MANGES LLP**

12  
13 By: /s/ Drew Tulumello

14 Drew Tulumello

15 *Attorneys for Defendant Visa Inc.*

16  
17 DATED: December 20, 2024

**MORVILLO ABRAMOWITZ GRAND  
IASON & ANELLO PC**

18  
19  
20 By: /s/ Jonathan S. Sack

21 Jonathan S. Sack

22 *Attorneys for Defendant David Tassillo*  
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27  
28

1 DATED: December 20, 2024

**COHEN & GRESSER LLP**

2  
3 By: /s/ Matthew V. Povolny

4 Matthew V. Povolny

5 *Attorneys for Defendant Feras Antoon*

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7  
8 DATED: December 20, 2024

**WALDEN MACHT HARAN & WILLIAMS  
LLP**

9  
10 By: /s/ Ronald G. White

11 Ronald G. White

12 *Attorneys for Defendant Bernd Bergmair*

13  
14 DATED: December 20, 2024

**PAUL HASTINGS LLP**

15  
16 By: /s/ James M. Pearl

17 James M. Pearl

18 Adam M. Reich

19 Emma Lanzon

20 Kiaura Clark

21 *Attorneys for Defendants Redwood Capital*  
22 *Management, LLC, Redwood Master Fund,*  
23 *Ltd, Redwood Opportunity Master Fund,*  
24 *Ltd, Manuel 2018, LLC, Ginogerum, LLC,*  
25 *and White-Hathaway Opportunity Fund,*  
26 *LLC*

1 DATED: December 20, 2024

**WHITE & CASE LLP**

2  
3 By: /s/ David G. Hille

4 David G. Hille

5 Kevin C. Adam

6 Russell J. Gould

7 *Attorneys for Defendants Colbeck Capital*  
8 *Management, LLC, CB Media Ventures DD,*  
9 *LLC, CB Agency Services, LLC, and CB*  
10 *Participations SPV, LLC*  
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**ATTESTATION STATEMENT**

I, David M. Stein, the filer of this declaration, attest pursuant to Rule 5-4.3.4(a)(2) of the Local Rules for the United States District Court for the Central District of California that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: December 20, 2024

**OLSON STEIN LLP**

/s/ David M. Stein

David M. Stein

*Attorney for Plaintiff*



**CERTIFICATE OF SERVICE**

I, the undersigned counsel of record for Plaintiff, certify that the foregoing instrument was served pursuant to the Federal Rules of Civil Procedure on December 20, 2024 upon all counsel of record via ECF.

Dated: December 20, 2024

**BROWN RUDNICK LLP**

/s/ Lauren Tabaksblat

Lauren Tabaksblat

*Attorney for Plaintiff*